

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
(PHILADELPHIA)**

IN RE:

Juan A Garzon aka Alejandro Garzon  
aka Alex Garzon and Claudia M. Garzon

Debtor(s).

CHAPTER 13

CASE NO.: 18-16259-mdc

**NOTICE OF ENTRY OF APPEARANCE  
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that NewRez LLC dba Shellpoint Mortgage Servicing as servicer for Wells Fargo Bank, National Association, not in its individual or banking capacity, but solely as Trustee on behalf of the Irwin Home Equity Loan Trust 2007-1 ("Wells Fargo), secured creditor to the above entitled Debtors by and through its undersigned counsel, hereby enters its appearance pursuant to Bankruptcy Rule 9010(b); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3007 and 9007 and Section 342 of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned case be given and served upon the undersigned at the following addresses and telephone/facsimile numbers:

Angela C. Pattison, Esquire  
Hill Wallack LLP  
1415 Route 70 East, Suite 309  
Cherry Hill, NJ 08034  
Telephone: (856) 616-8086  
Facsimile: (856) 616-8081  
Email: [apattison@hillwallack.com](mailto:apattison@hillwallack.com)

PLEASE TAKE FURTHER NOTICE that neither this Notice of Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive

Wells Fargo's (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Wells Fargo is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: October 6, 2023

Hill Wallack LLP

By: /s/ Angela C. Pattison  
Angela C. Pattison, Esq.  
1415 Route 70 East, Suite 309  
Cherry Hill, NJ 08034  
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Counsel to NewRez LLC dba Shellpoint Mortgage  
Servicing as servicer for Wells Fargo Bank,  
National Association, not in its individual or  
banking capacity, but solely as Trustee on behalf of  
the Irwin Home Equity Loan Trust 2007-1

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
(Philadelphia)**

IN RE:

Juan A Garzon aka Alejandro Garzon  
aka Alex Garzon and Claudia M. Garzon

Debtor(s)

CHAPTER 13

CASE NO.: 18-16259-mdc

**CERTIFICATE OF SERVICE**

I hereby certify that service was made upon all interested parties, indicated below of (i) Notice of Appearance of NewRez LLC dba Shellpoint Mortgage Servicing as servicer for Wells Fargo Bank, National Association, not in its individual or banking capacity, but solely as Trustee on behalf of the Irwin Home Equity Loan Trust 2007-1 in the manner indicated below on October 6, 2023:

Juan A Garzon  
303 Melvin Avenue  
Morrisville, PA 19067

Claudia M. Garzon  
303 Melvin Avenue  
Morrisville, PA 19067

**Debtors**

**Via Regular Mail**

BRAD J. SADEK  
Sadek Law Offices, LLC  
1500 JFK Boulevard – Ste 220  
Philadelphia, PA 19102

**Counsel for Debtor**

**Via ECF**

Office of the U.S. Trustee  
Robert N.C. Nix Federal Building  
900 Market Street – Suite 320  
Philadelphia, PA 19107  
**United States Trustee**  
**Via ECF**

KENNETH E. WEST  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107  
**Chapter 13 Trustee**  
**Via ECF**

By: /s/ Angela C. Pattison  
Angela C. Pattison, Esq.,  
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